

SECRET

**MANAGEMENT STAFF COMMENTS REGARDING
PROPOSED HANDBOOK "PROCESSING OUT PROCEDURES"**

1. The Director of Personnel states that [redacted] of the proposed handbook is necessary because [redacted] contains detailed procedures governing separations. The Management Staff survey found that regulations - in existence or proposed - do not contain sufficient procedural guidance for operating personnel. Moreover, the Management Staff recommended, Personnel concurred in, and the Deputy Director (Support) approved a [redacted] handbook.
2. The proposed handbook shifts responsibility for processing out separating employees from the Office of Personnel to employing components. This is contrary to the Management Staff recommendation, concurred in by Personnel and approved by the DD/S. During the course of the survey, the Office of Personnel was most emphatic in insisting that Office of Personnel should be the local point for processing, not the operating offices. An employing component should be responsible only for insuring that its internal relationships with the separating employee are concluded.
3. The proposed handbook defines "property" as including equipment, documents, publications and advances of funds. This is a confusing definition of property; moreover, this definition does not cover other relationships or obligations which must be concluded by the separating employee, such as cover arrangements.
4. The title of the proposed handbook - "Processing Out Procedures" - is not descriptive of the objective. Suggest "Procedures for Processing Separating Agency Employees".
5. Paragraph 1 of the proposed handbook states that the handbook applies to "departing agency personnel". This is confusing; "departing agency personnel" could mean employees going on leave or TII, and such application is not intended.
6. Paragraph 1 refers to accountability for Government-owned property in the custody of departing personnel. This should be revised to include accountability for, or settlement of, all obligations to and official relationships with CIA. It should, for example, include obligations by the Agency to separating employees. There have been many cases of this type.
7. Paragraph 2 fails to extend the handbook to employees going on PCS. Such coverage was recommended in the Management Staff study.

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SECRET

SECRET

8. Paragraph 3, definition of "property". See paragraph 3 above.

9. Paragraph 3 of the proposed handbook refers to Government funds which have been advanced to an employee and not accounted for. This should also include other funds for which the employee may have to account (such as overpayments in salary, per diem, travel expenses, etc.) as well as obligations by CIA to the separating employee.

10. Paragraph 3 refers to Form 21, Final Payment Clearance Sheet, but does not describe use of the form. Suggest that a sample form, prepared in accordance with the Management Staff's recommendations, be included as an attachment to the proposed handbook.

11. Paragraph 1a assigns responsibility for processing out procedures to the employing component. The Office of Personnel should be the focal point for such processing. See paragraph 2 above. Suggest that the term "operating official" be substituted for "component" or "employing component", since a "component" would include a sub-division of a major agency component, and it was not intended that deprocessing take place at, for example, the section or branch level.

12. Paragraph 1b of the proposed handbook states that the Office of the Comptroller is responsible for effecting final settlement of the separating employee's obligations. This is not true; the Comptroller has nothing to do with conclusion of cover arrangements or return of classified documents.

13. Paragraph 1c states that "other Agency components, referred to herein as offices of record, are responsible for issuing clearances..." This should be more specific; "offices of record" (such as Logistics, Fiscal Division, etc.) should be named. The statement suggests that all "other Agency components" are offices of record, and this is not true.

14. The Management Staff recommended (recommendation 6a 1) that the employing component "notify Personnel, Finance, Fiscal, Logistics, and Security immediately, by telephone, of an anticipated separation or DOP, when it is apparent that normal written documentation or notice will not reach these offices at least two weeks in advance of the separation or DOP". No provision is made in the proposed handbook for this recommendation, which was concurred in by the Office of Personnel and approved by the DD/E.

15. Paragraph 5a of the proposed handbook makes no provision for the employing office to certify to the clearance of the separating employee on the Form 21, Final Payment Clearance Sheet. This provision was recommended by the Management Staff (recommendation 6a 3).

SECRET

SECRET

16. Paragraph 5a states that all clearances with Personnel, Security, and the Comptroller must be obtained by the employee personally. This should be revised to require personal clearance with Personnel, Security, Finance and Fiscal Divisions, as recommended by Management Staff (recommendation 6a B).

17. The proposed handbook does not provide that the deprocessing will be completed, whenever possible, on the day before final separation. This was recommended by Management Staff (recommendation 6a B).

18. Paragraph 7c states that when an employee separates overseas, the headquarters employing component will obtain from Central Processing Branch the clearances obtained "during the processing out when the individual was departing for his PCS assignment overseas". However, the handbook does not require any deprocessing for employees going overseas PCS (see our paragraph 7 above). Assuming there were such deprocessing prior to overseas departure, the employee's obligations may have changed by the time he separated overseas, so that the previous clearances would not be valid. Such clearance at headquarters should be made anew when the employee separates overseas, however, no provision is made in this paragraph for clearance at headquarters for the employee who was never permanently employed at headquarters, even though he may have incurred headquarters obligations while on H&K.

19. No provision is made in the proposed handbook for Management Staff recommendation 6a (B9), that the field notify headquarters by cable or dispatch regarding outstanding obligations or unsettled relationships incurred overseas by the employee who is returning to headquarters to separate or go on DMOP.

SECRET